

January 4 , 2023

From:

Nadire Atas (Plaintiff)

To:

United States District Court

Southern District of New York

Judge J. Paul Oetken, United States District Judge

Case Number : 22-CV-00853-JPO

Dear Judge Oetken:

1. I am the Pro Se Plaintiff in Case Number : 22-CV-00853-JPO and a Canadian national residing in Ontario, Canada.
2. I write this letter dated January 4, 2023 to **correct** my letter dated January 3, 2023 where I requested leave of the Court “ of fifteen (15) days to file a **fourth (4th) amended complaint.**
3. . In my letter dated January 3, 2023, it should have read that I request leave of the Court of fifteen (15) days to file a **third (3rd) amended complaint** and not a fourth (4th) amended complaint .
4. On December 22, 2023, the Court ordered the following :

MEMO ENDORSEMENT on re: [37] Letter, filed by Nadire Atas. ENDORSEMENT: Plaintiff's request to correct the filing of her Second Amended Complaint is GRANTED. Plaintiff shall file the Second Amended Complaint on ECF on or before December 28, 2022. (Amended Pleadings due by 12/28/2022.) (Signed by Judge J. Paul Oetken on 12/22/2022) (ate)

5. My complaint is complex and the factual allegations include that the New York Times and its reporters and family members assisted in and pursued criminal charges on the same set of facts published in the New York Times.

6. The balance of my letter dated January 3, 2023 is correct. I ask for permission of fifteen (15) days to file a third (3rd) amended complaint to expand on the summary of the action in my complaint and on the factual allegations in my complaint.

7. In addition, I would like to plead *inter alia* the following cause of actions :

- a. Deliberate Infliction of Harm
- b. Civil Conspiracy
- c. Defamation Per Se
- d. Defamation by Implication
- e. Defamation Slander
- f. Emotional Distress, Intentional Infliction
- g. Injurious Falsehood
- h. A Prima Facie Claim of Defamation
- i. Intentional Infliction of Emotional Distress
- j. Negligent Infliction of Emotional Distress
- k. Negligence and Gross Negligence
- l. Defendants' Tortious Conduct Has Caused Plaintiff to Suffer Special Damages
- m. Conflict of interest of the Journalist and the New York Times

Respectfully

Nadire Atas (Plaintiff) Case Number : 22-CV-00853-JPO)